

September 5, 2014

Delivered via electronic mail

Ms. Brenda South  
USEPA REGION 8  
1595 Wynkoop St.  
**Mail Code:** 8P-R  
Denver, CO 80202-1129

Re: initial notification of PCB contaminated oil event

Dear Ms. South,

As a follow up to the voicemail message I left with you today, the purpose of this letter is to provide notification to your office of the PCB event that occurred at our Salt Lake City location.

Thermo Fluids Inc. is an environmental services company that operates a used oil collection and transfer station in Region 8, located in Salt Lake City, Utah. On August 26<sup>th</sup>, 2014 at approximately 9:30 am, we became aware via our third party laboratory, through routine analysis activities, that we had a used oil storage tank that was contaminated with PCB's (Arochlor 1016) at a concentration of 21.92 parts per million (ppm).

When we became aware of this event, Thermo Fluids immediately locked down our operations in Salt Lake City and initiated an extensive internal investigation to identify the nature and extent of the event. The source of contamination would have to be from one of our used oil collection customers as we have no source of PCBs related to our operations. It is important to note that no contaminated oil was released from the facility either to the environment or to downstream customers.

We have identified and provided notification to the generator of the contaminated oil. The generator has violated both the EPAs TSCA PCB and applicable Used Oil management rules as well as DOT and EPAs rules for offering PCB's for transport. Finally, they also violated Thermo Fluids standard contractual arrangements by offering such materials as used oil appropriate for Part 279 recycling. This event has resulted in significant costs and decontamination actions now necessary for our Salt Lake City operation.

The contaminated oil resulting from this event will be sent to a fully permitted facility for disposal. All tanks, piping, and transport vehicles will be decontaminated as prescribed under 40 CFR 761.79 (c) prior to them being returned to service.

Respectfully,



Greg Hedger  
Corporate Director – EHS  
Thermo Fluids, Inc.

**Mountain States Region**  
3534 West 500 South  
Salt Lake City, UT 84104  
801.433.1114 Main  
801.433.1120 Fax

**Northwest Region**  
12533 SE Carpenter Dr.  
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503.788.4612 Main  
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**South Central Region**  
9900 North Crowley  
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**Southwest Region**  
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**Corporate Office**  
8925 E Pima Center Pkwy, #105  
Scottsdale, AZ 85258  
480.302.6221 Main  
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Cc:

T. Sinclair – Chief Operating Officer, Thermo Fluids Inc.  
K. Davis – Risk Management, Nuverra  
D. Wheeler – Utah Department of Environmental Quality

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